U.S Department of Transportation
Research and Special Programs Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

NOV 2 1998

Mr. Dennis Fothergill
Manager, Pipeline Safety Department
Oklahoma Corporation Commission
P.O. Box 52000-2000
Oklahoma City, OK 73152-2000

Dear Mr. Fothergill:

Thank you for your letter of October 9, 1998, transmitting a letter from James A. Henry of the Koch Pipeline Company LP. His letter requests your approval of Koch's plan to replace steel pipe between breakout tanks and transfer pumps at it's Cushing Station with polyethylene pipe. We are treating Mr. Henry's letter as the notification required under 49 CFR 195.8 before any person may transport hazardous liquid through pipe other than steel.

As required by § 195.8, we have considered the proposed transportation to determine if it would be unduly hazardous. We note that, in addition to meeting Part 195 requirements, the proposed plastic pipeline will be designed and constructed in accordance with applicable plastic pipe regulations in 49 CFR Part 192. With this understanding, and since you have no objection to the proposal, we have determined that the installation and operation of the proposed plastic piping as described in Mr. Henry's letter would not be unduly hazardous.

If we can be of further assistance, please contact me or Mr. Furrow at (202) 366-4559.

Sincerely,
Richard B. Felder
Associate Administrator for Pipeline Safety

OKLAHOMA CORPORATION COMMISSION
P. O Box 52000-2000
Oklahoma City, OK 73152-2000

October 9, 1998

Mr. Richard B. Felder
Associate Administrator for Pipeline Safety
Research and Special Programs Administration
Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

Dear Mr. Felder:

Attached for your review and consideration is KOCH Pipeline Company's, request (as required by 1195.8) to install and operate a crude oil gathering pipeline within the town of Cushing, OK using polyethylene line pipe. In addition to meeting the requirements of 49 CFR Part 195, the proposed pipeline will be designed and constructed in accordance with applicable plastic regulations in 49
CFR part 192.

The Oklahoma Corporation Commission has reviewed the request and has no objection to KOCH Pipeline Company's, request to install and operate a crude oil gathering pipeline within the town of Cushing, Oklahoma using polyethylene line pipe.

If you have any questions concerning this matter, please contact the undersigned.

Sincerely,
Dennis Fothergill, Manager
Pipeline Safety Department

KOCH PIPELINE COMPANY LP
P.O. Box 29
Medford, Oklahoma 73759

Certified Mail, Return Receipt Requested

September 16, 1998

Mr. Dennis Fothergill, Manager
Pipeline Safety Department
Oklahoma Corporation Commission
P.O. Box 52000-2000
Oklahoma City, Oklahoma 73152-2000

Dear Mr. Fothergill:

As required under 49 CFR Part 195.8, Koch Pipeline Company, L.P. is providing notification to your agency of our proposal to replace certain piping within Koch's Cushing Station with polyethylene pipe.

The following information is provided for your consideration:

- The proposed installation will replace existing steel pipe from station breakout storage tanks to station transfer pumps as shown on attached drawing.
- The proposed piping will remain in crude oil service.
- Installation will consist of approximately 1,500 feet of new 12, 16, 18 and 24 inch SDR-11, CSR Poly Pipe, 4810 PE 3408 or equal, rated at 65 psig at 100 degrees for crude oil service as established by the manufacturer. Design Pressure Rating Data Sheets furnished by the supplier for the calculation of the design pressure are attached for your use and information.
- Pipe and fittings shall be manufactured in accordance with ASTM D2513, "Standard Specification for Thermoplastic Gas Pressure Pipe, Tubing, and Fittings".
- The proposed piping will be designed and constructed under applicable plastic pipe regulations found in 49 CFR Part 192. Transportation of Natural and Other Gas By Pipeline: Minimum Federal Safety Standards.
- The polyethylene pipe joints will be joined by heat fusion.
- Pipe will be installed with minimum cover of 30 inches below grade.
- The piping will be pressure tested to 60 psig for a minimum of 4 continuous hours (8 continuous hours, if not visually inspected for leakage), thereby establishing a maximum operating pressure of 40 psi. Because the system will be exposed only to tank head pressure, maximum head pressure being calculated as 21.5 psig, over-pressure protection will not be required.

Koch Pipeline Company, L.P., respectfully requests your consideration and approval of this proposed project.

If additional information is required please contact me at the address shown.

Respectfully,
James A. Henry
Regulations Coordinator 98003